



CODE OF ETHICS

1. Statement of Purpose

The purpose of this code is to protect, sustain, and enhance the credibility of the programming, reporting and services provided by White Ash Broadcasting, Inc. (“WAB”) to provide for the proper use of social networking sites. Our listeners depend on WAB’s content for objective and accurate information. To maintain our integrity and credibility as a media institution and valued community resource, this code underscores the values of the public media and WAB to ensure integrity, impartiality and independence and to maintain the highest standards of conduct by station personnel at all times. Also it is important that WAB maintain standards consistent with those of National Public Radio (“NPR”) and other news organizations to which we contribute.

2. Who Is Covered?

This Code of Ethics applies to all WAB personnel, including Employees, Contract Employees, Supervisors and Managers at all levels of WAB. Especially sensitive and critical is the application of this code to those involved in content development, production, and management, including editorial, programming, and content Employees (“Editorial/Content Staff”). Editorial/Content Employees extends to news editors, producers, reporters, announcers, hosts, content researchers and interns as well as program editors, producers, and hosts. The code also applies to material provided to WAB by NPR, independent producers, other stations, reporters, freelance reporters, writers, or news contributors. WAB expects these contributors to be free of conflicts of interest on content they submit, to be fair and accurate in creating that material and to pursue reporting and programming in a manner consistent with the ethical principles stated in this code

3. Principles and Standards of This Code

Our mission and public trust mandates that our reporting and programming be fair, unbiased, accurate, complete, and honest. At WAB we are expected to conduct ourselves in a manner that leaves no question about our independence and fairness. We must treat the people we cover and our audience with respect. “Fair” means that we present the important views on a subject. “Unbiased” dictates that we separate our personal opinions or perspectives, such as religious beliefs or political ideology, from the subjects we are covering. “Accurate” means that rigorous efforts are made to ensure our facts are not only correct but presented in the correct context. “Honest” means we do not deceive the people or institutions we cover about our identity or intentions and we do not deceive our listeners. “Respect” means we treat people we cover and our audience with respect by approaching subjects in an open-minded, sensitive and civil way. Any compromise of these principles will betray our public trust and the listeners whom we serve

4. Conflicts of Interest

All personnel shall avoid activities that would give rise to conflicts of interest, real or perceived, with the programming and services of WAB, as outlined in the WAB Conflicts of Interest Policy. An Employee covered by this code has the responsibility to disclose potential or apparent conflicts of interest before participating in WAB coverage or activities where such a conflict exists or appears to exist. Employees must, at the time they are assigned to cover or work on a matter, contract or project, disclose to their immediate Supervisor any business, commercial, financial or personal interests where such interests might reasonably be construed as being in actual, apparent or potential conflict with their duties.

5. Politics, Community and Outside Activities

Personnel are to be aware that their engaging in political, community, or outside activities may call into question their impartiality and ability to report fairly on a subject or undermine the credibility of WAB. Yet WAB does not want to restrict the rights of its personnel to participate in the political process unnecessarily. The following guidelines are provided to strike a balance between the interests of WAB and its personnel, and to recognize the unique responsibilities and expectations for Employees involved in journalism and content creation/presentation. This policy outlines a two-tiered standard, with more stringent requirements regarding political activities for journalists and Editorial/Content

Employees. To resolve doubts and provide clarification, all personnel, are advised to discuss questions that may arise with their appropriate Supervisor.

a. Political Activities. Personnel in their public lives must be sensitive to situations which may call into question their impartiality on political matters and may give rise to an appearance of partiality. Yet in their private citizen role, Employees not involved in journalism or Editorial/Content roles may endorse or contribute to electoral candidates, electoral campaigns, publicly support ballot measures, or sign petitions on condition that they use their home address and private telephone numbers. However, they may not serve in a publicly elected office or display their political advocacies in their offices, cubicles or on their persons while at work. Journalists and Editorial/Content Employees may not endorse or contribute to electoral candidates, electoral campaigns, publicly support ballot measures, or sign petitions. All personnel of WAB are encouraged to express their views at the ballot box.

b. Marches or Rallies. As private citizens, Employees not involved in journalism or Editorial/Content roles may participate in marches or rallies for issues of public concern, provided good judgment is exercised when the particular cause involves a matter that WAB covers or may cover. Journalists and Editorial/Content Employees may not participate in political marches or rallies involving issues covered by the station.

c. Associations. WAB encourages and does not restrict any of its personnel from participating in community, labor, civic, religious, or professional organizations or from serving on such boards. Yet they may be advised to review their board service when such organizations are engaged in significant lobbying or political activity, or are actively involved in controversial issues of public importance where participation may call WAB's objectivity on a particular issue into question. Journalists and Editorial/Content Employees should consult with their Supervisor before participating in board activities with community, labor, civic, religious, or professional organizations, so that WAB can assess the matter and take appropriate action, if necessary. Journalists should not cover news involving the groups they are involved with.

d. Activities of Associates. When a spouse or immediate family member is involved in a political activity that may call into question WAB's objectivity on a specific issue, the Employees working on that issue should disclose the matter to the appropriate Supervisor so that WAB can assess the matter and take appropriate action, if necessary.

6. Gifts, Gratuities, Freebies, Items for Review

To avoid the appearance of impropriety, personnel shall not accept or solicit business-connected gifts or free services from vendors or news and content sources, with the exception of nominal courtesies. Employees may accept gifts of token value, such as hats, mugs, or t-shirts, but items of significant value will be returned with a letter thanking the sender and stating our policy on gifts. Items received at WAB for review, such as books, CDs, or tickets, belong to WAB and may be distributed to Employees or volunteers for their personal use. Travel reimbursement for WAB related and approved business by an outside organization may be acceptable in certain cases, such as conferences and conventions, if such travel arrangements are disclosed and approved in advance by the Employee's Supervisor.

7. Outside Work, Freelancing, Speaking Engagements, Commercial Endorsements

Personnel may not engage in outside employment or freelancing that would create an actual or apparent conflict of interest or work in direct competition with WAB. Any employment or freelancing outside WAB must be approved in advance and in writing by the Employee's Supervisor. An Employee who has been asked to make a speech or presentation, whether paid or unpaid, outside the normal course of WAB hosted or planned activities, should obtain prior approval from the Employee's Supervisor. Employees may not endorse commercial products, companies or services, whether or not payment is received.

8. Corporate Underwriting, Foundation Funding, and Promotions

To preserve the independence of WAB's programming, an ethical wall will be maintained between WAB's Editorial/Content Employees and Employees involved in corporate underwriting, funding and promotions. The President and General Manager will assign individuals who will work with programming Employees and serve as contacts with funders for grant-making purposes or other communications. If WAB reports on an organization or individual who funds us, we will disclose that relationship on air if the subject of the report is directly related to the thrust of the grant we received. When authorized by the President and General Manager, Editor/Content Employees may take part or be asked to

take part in promotional activities or events involving supporters of WAB, such as our coordinated fund drives, listener support spots, and audience-building initiatives.

9. Proper Use of Social Network Sites

Social networking sites, such as Facebook, Instagram and Twitter, are becoming increasingly important tools for WAB and its staff to interact with our audience, gather information, conduct research, and heighten important communication. WAB encourages Employees to take advantage of social media which also serves an audience beyond radio. Because the line between private and public activity has been blurred by these tools, it is necessary to provide guidance and cautions on their use. Information on your Facebook page, your blog entries and your tweets can easily be circulated beyond family and friends. This content represents you and WAB to the outside world as much as a radio story does. The following guidelines apply to every Employee who is advised to consult with their Supervisor when in doubt:

- a. Recognize that everything you write or receive on a social media site is public.
- b. Use the highest level of privacy tools available to control access to your personal activity when appropriate.
- c. Linking to KVPR.org is strongly encouraged, but you may not repost KVPR copyrighted material without prior permission.
- d. Remember each social media site has its own terms of service that apply to what you post and gather on that site.
- e. The same ethical rules that apply to offline information gathering also control online work, such as identifying yourself as a WAB Employee when working online and always verifying the accuracy of material collected and received.
- f. You may not advocate for political or other polarizing issues online, and mere participation in some online groups could be seen as endorsing their views.
- g. If you are writing about meetings and gatherings at WAB, always ask first if the forum is on or off the record before distributing information or content to them.

10. Application and Enforcement of this Code

Application and enforcement of this code is the responsibility in the first instance of every Employee and especially of the Editorial/Content Employee. Employees should feel free to offer suggestions to their peers to help them comply with their obligations under this code, and such suggestions should be welcomed and discussed with professionalism and respect. Editors, Producers, and Supervisors have special responsibility for the application of this code to matters they are editing and producing and should be satisfied that each program and report that is produced meets the standards of this code. If there is any question on the part of an individual regarding an actual, apparent, or perceived conflict or questionable activity, it should be disclosed to the Employee's Supervisor in advance. Every Employee will be given a copy of this Code of Ethics and will be responsible for knowing and complying with its provisions. As amendments and revisions are made to this code, they will be provided to each Employee. Employees who do not comply with this code may be subject to disciplinary action, up to and including termination.

Adopted February 23, 2010

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